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Information Technology

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April 15, 2003

Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: RM No. 10687 – Opposition

Dear Madam Secretary:

This is in response to the FCC's Public Notice, Report No. 2601, released on 26 March 2003, concerning the petition of the Industrial Telecommunications Association ("ITA") to become certified by the Federal Communications Commission as a frequency coordinator in the Railroad Radio Service in the United States.

Canadian National Railway ("CN") has a strong interest in this matter in view of its extensive U.S. and Canadian rail operations. CN has 17,821 route-miles of track in Canada and the United States, and 57% of CN's \$6.1 billion (CDN) in 2002 revenues came from U.S. domestic and cross-border traffic.

CN believes strongly that it would be contrary to the best interests of U.S. and Canadian railway operations for the FCC to certify multiple entities to be frequency coordinators for railroad mobile radio channels in the U.S., particularly entities that are not knowledgeable about or answerable to the rail industry.

For as long as railroads in Canada and the U.S. have been using mobile radio technology, there has been a single railroad frequency coordinator in each country. At present, the Association of American Railroads ("AAR") is the sole coordinator in the U.S., and the Railway Association of Canada ("RAC") is the

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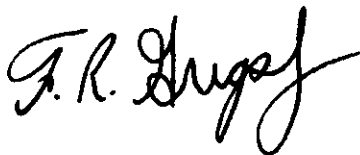
exclusive coordinator in Canada. Both of those organizations are membership associations that are controlled by and answerable to their member railway companies. The professional staffs of AAR and RAC include persons who are knowledgeable and experienced in rail operations -- attributes that are essential to performing the frequency coordination function for railroad mobile radio applications.

CN has reviewed the letter from RAC to the FCC dated 7 April 2003 filed in this proceeding, and CN agrees completely with the views expressed there, especially RAC's views regarding the need for a single coordinator in each country to effect the change to narrowband channelization adopted by the FCC and Industry Canada. As explained by RAC, the upcoming narrowband migration promises to be an extensive and complex transition for all railroads in Canada and the United States, and will require careful centralized planning in both countries accompanied by close consultation and cooperation by the U.S. and Canadian frequency coordinators.

The task of managing the transition to narrowband will be difficult enough under the present frequency coordination scheme. It would become unnecessarily complicated -- indeed, it could become impossible -- if multiple frequency coordinators who possess no knowledge of railroad operations were permitted to play a part.

In summary, CN agrees with RAC that the ITA petition should not be approved.

Sincerely,



F.R. Grigsby
Vice President and Chief Information Officer

cc: Mr. Jeremy Denton
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